

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBIN PERRY,

Defendant.

CASE NO. CR17-0203-JCC

PROTECTIVE ORDER

This matter comes before the Court on a stipulated motion for discovery protective order between the United States and Defendant Robin Perry (Dkt. No. 101).

The Court hereby GRANTS the motion and enters the following order:

**DISCOVERY PROTECTIVE ORDER**

**A. Definitions**

As used in this Order, the term "Protected Information" means any date of birth, Social Security number, driver's license number, bank account number, credit card number, personal identification number, address, telephone number, name and/or location of employment, criminal history record, background check, victim identity, and/or any other similar information or number implicating a privacy interest of and belonging to an individual, business, partnership, or corporation.

1 As used in this Order, the term “Protected Material” means any document or other record  
2 containing or reflecting Protected Information.

3 **B. Permissible Disclosure of Protected Information and Protected Material**

4 The United States will make available copies of the Protected Material to defense counsel  
5 to comply with the government’s discovery obligations. Possession of the Protected Material is  
6 limited to defense counsel, their investigators, paralegals, assistants, law clerks, and experts  
7 (“members of the defense team”).

8 Members of the defense team may not provide copies of the Protected Material to other  
9 persons, including defendants themselves. Members of the defense team may review Protected  
10 Information and/or Protected Material with defendants. The defendants may visually inspect and  
11 review such documents but shall not be allowed to possess Protected Information (such as  
12 unredacted copies of Protected Material, notes, copies, or photographs of such Protected Material  
13 containing Protected Information). The defendants may possess documents from which all  
14 Protected Information has been redacted.

15 Members of the defense team may review or discuss the contents of documents  
16 containing Protected Material with any prospective witness, as long as they do not share the  
17 unredacted documents, or share any Protected Information with any prospective witness.

18 **C. Filing**

19 If any Protected Information or Protected Material is filed in court or otherwise  
20 disseminated as part of litigation, the parties shall redact such information prior to filing; unless,  
21 based on a party’s application prior to filing, the Court finds that an unredacted filing is  
22 necessary and appropriate.

23 **D. Maintenance**

24 Members of the defense team shall keep any Protected Material secured whenever the  
25 Protected Material is not being used in furtherance of their work in the above-captioned case.

26 All documents containing Protected Material shall be returned to the

1 United States, or destroyed, once all charges are resolved by dismissal or by final conviction.

2 The provisions of this Order shall not terminate at the conclusion of this prosecution.

3 **E. Modification**

4 The parties agree that this Protective Order may be modified, as necessary, by filing with  
5 the Court a Stipulated Order Modifying the Protective Order, or by other order of the Court.

6 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

7 DATED: October 13 , 2017 /s/Marie M. Dalton

8 Attorney for Plaintiff United States of America

9 DATED: October 13, 2017 /s/Sean P. Gillespie

10 Attorney for Defendant Robin Perry

11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12 DATED this 25th day of October 2017.

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16 John C. Coughenour  
17 UNITED STATES DISTRICT JUDGE  
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